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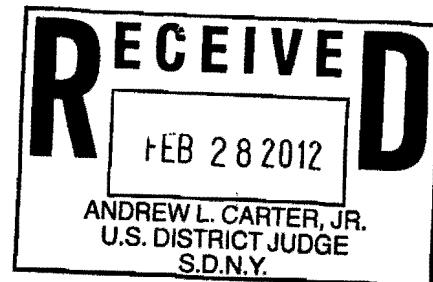
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February 28, 2012

VIA ELECTRONIC MAIL

Honorable Andrew L. Carter, Jr.
U.S.D.C. – Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007



Re: da Silva Moore, et al v. Publicis Groupe SA, et al. (11-cv-1279) (ALC) (AJP)

Dear Judge Carter,

Pursuant to the Sealed Records Filing Instructions of the United States District Court for the Southern District of New York, Plaintiffs respectfully request permission to file certain confidential documents under seal. Defendant Publicis Groupe (“Publicis”) has consented. Defendant MSLGroup (“MSL”) has requested a list of documents being filed under seal so that it can determine whether it consents, but Plaintiffs are not yet in a position to provide such a list.

Plaintiffs plan to seek conditional certification of a collective action and leave to file a proposed Second Amended Complaint on Wednesday, February 29, 2012. Many of the documents relied upon for Plaintiffs’ conditional certification motion and proposed Second Amended Complaint are ones that have been marked “Confidential” by the parties pursuant to their Confidentiality Agreement (attached hereto as Ex. A, and to be filed with the Court shortly). Accordingly, Plaintiffs request permission to file any confidential exhibits, as well as portions of the conditional certification motion and Second Amended Complaint that reference confidential material, under seal.

We thank the Court for its time and consideration.
 Plaintiffs are permitted to file certain confidential documents under seal. If MSL Group objects to a specific document(s), it should file a letter no later than 3/2/12. The Court will then determine if the contested documents should remain under seal.

cc: All counsel of record.

SO ORDERED.

Andrew L. Carter, Jr.
HON. ANDREW L. CARTER, JR.
UNITED STATES DISTRICT JUDGE

2-29-12